



MURIEL GOODE-TRUFANT
Corporation Counsel

GREGORY J.O. ACCARINO
Senior Counsel
phone: (212) 356-1945
gaccari@law.nyc.gov

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

June 23, 2025

BY ECF

Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

*The deadline for the Rule 26(f)
Report is canceled. The July 31, 2025
conference is canceled. The parties
shall report to the Court on the
status of the case by 8/26/25.*

Re: Ambrose Haskins v. City of New York, et al.
25 Civ. 2922 (JGK)

So ordered.

JGK/koeltl

6/24/25 U.S.D.S.

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel for the City of New York, and attorney for defendants City of New York, John Caruso, Jordan Abidin, and Ivan Luciano ("defendants") in the above-referenced matter. Defendants write to respectfully request that the Court adjourn (1) the July 2, 2025 deadline for the parties to submit a Rule 26(f) Report, until a date convenient for the Court following the conclusion of the deadlines set forth in Local Civil Rule 83.10 ("the § 1983 Plan"), and (2) a corresponding adjournment of the July 31, 2025 Initial Conference. This is defendants' first such request and it does not affect any other Court deadlines. Plaintiff's counsel consents to this request.

By way of background, plaintiff brings this action, pursuant to 42 U.S.C. § 1983, against the City of New York, three individual defendant New York City Police Department ("NYPD") Detectives, and John/Jane Doe NYPD Officers, alleging federal claims of, *inter alia*, denial of the right to a fair trial, malicious prosecution, and municipal (*Monell*) liability, stemming from plaintiff's arrest on January 31, 2021 and subsequent prosecution. *See* Dkt. No. 1, Complaint, April 9, 2025. On April 10, 2025, this case was designated to participate in the § 1983 Plan, and follow the § 1983 Plan's deadlines. *See* Dkt. Entry, Notice, April 10, 2025. On June 17, 2025, the defendants filed their Answer to the Complaint. *See* Dkt. No. 26, Answer, June 17, 2025.

With respect to the request for an adjournment of July 2, 2025 deadline to submit a Rule 26(f) Report and an adjournment of the July 31, 2025 Initial Conference, this request is made to allow this case to first proceed through the steps set out in the § 1983 Plan, which is designed to facilitate early resolution of matters without the need for Court intervention or involvement.

Following the defendants' response to the Complaint, the § 1983 Plan requires the parties to exchange initial disclosures and limited discovery, plaintiff to provide a settlement demand, defendants to respond to the plaintiff's settlement demand, and for the parties to participate in a mediation in accordance. *See generally* Local Civil Rule 83.10. The parties will now be beginning that process as the defendants have just filed an Answer yesterday. Today, the Court set the § 1983 Plan 100-Day Review for September 26, 2025, and noticed a selection for mediation. *See* Dkt. Entry, Local Civil Rule 83.10 100-Day Review, June 28, 2025; and Dkt. Entry, Notice of Selection for Mediation, June 18, 2025. Therefore, the defendants respectfully request that the parties be permitted to engage in and fulfill their obligations under the § 1983 Plan prior to filing a Rule 26(f) Report or participating in an Initial Conference.

Accordingly, defendants respectfully request, with plaintiff's consent, that the Court adjourn (1) the July 2, 2025 deadline for the parties to submit a Rule 26(f) Report, until a date convenient for the Court following the conclusion of the deadlines set forth in Local Civil Rule 83.10, and (2) a corresponding adjournment of the July 31, 2025 Initial Conference.

Defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/ Gregory J.O. Accarino

Gregory J.O. Accarino
Senior Counsel
Special Federal Litigation Division

cc: **By ECF**
Cary London
Attorney for Plaintiff